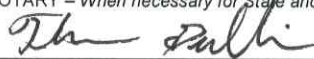


EXHIBIT L

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC	
Pennsylvania Human Relations Commission and Philadelphia Commission on Human Relations and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Caitriona Brady		Home Phone (Incl. Area Code) 856-454-3729	Date of Birth 05-08-1996
Street Address City, State and ZIP Code 749 Selter Street, Philadelphia 19147			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name Middle East Forum		No. Employees, Members 25	Phone No. (Include Area Code) 215-546-5406
Street Address City, State and ZIP Code 1650 Market Street, Suite 3600, Philadelphia PA 19103			
Name Gregg Roman, Daniel Pipes, Matt Bennett		No. Employees, Members 25	Phone No. (Include Area Code) 215-546-5406
Street Address City, State and ZIP Code 1650 Market Street, Suite 3600, Philadelphia PA 19103			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input checked="" type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest May 2017 - Present <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): Charging Party, Caitriona Brady ("Charging Party") was subjected to discrimination and harassment by Respondents, Middle East Forum, Gregg Roman, Daniel Pipes, and Matt Bennett (collectively "Respondents") based upon Charging Party's sex and gender. The discrimination and harassment to which Charging Party was subjected was severe and pervasive and created a hostile work environment. Charging Party's supervisors were Gregg Roman, Daniel Pipes, and Matt Bennett. During Charging Party's employment, Respondents, including Respondent, Gregg Roman, subjected Charging Party to discrimination and harassment by cursing, yelling, screaming, shouting, insulting, belittling, disparaging, and verbally abusing female staff including Charging Party, Caitriona Brady. Charging Party, Caitriona Brady reported Respondent, Gregg Roman's severe and pervasive discrimination and harassment and was subjected to retaliation. Respondent, Gregg Roman created a hostile work environment and then enforced policies whereby Charging Party and the other female staff were denied the ability to report the severe and pervasive discrimination and harassment in the workplace. Respondent, Gregg Roman initiated, implemented and enforced a policy whereby female staff members were not allowed to interact with the President of the Middle East Forum, Daniel Pipes. Respondent, Gregg Roman actively and willfully worked to subjugate female employees of the Middle East Forum through policies designed to impede, obstruct, and prevent female employees from vindicating their right pursuant to Title VII of the Civil Rights Act. Respondent, Gregg Roman ordered female employees including Charging Party never to speak directly with President, Daniel Pipes. In November 2018, Charging Party, Caitriona Brady notified and reported Respondent, Gregg Roman's discrimination and harassment of the female staff during a meeting with Respondent, Daniel Pipes when almost every female employee of the Middle East Forum came forward together to report the severe and pervasive discrimination and harassment to which female staff were subjected by Respondent, Gregg Roman.			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements 	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT <input checked="" type="checkbox"/> Caitriona M Brady	
X 01/13/19 Date		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year) 6/13/19	
Caitriona M Brady Charging Party Signature		Commonwealth of Pennsylvania - Notary Seal THOMAS SULLIVAN, Notary Public Philadelphia County My Commission Expires March 11, 2023 Commission Number 1347443	

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

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Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA
☒ EEOC
Pennsylvania Human Relations Commission and Philadelphia Commission on Human Relations and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

The female staff reported Respondent, Greg Roman's harassment, bullying, and his intolerable, onerous, and abusive conduct and comments designed to discriminate against female employees of the Middle East Forum. Those present at the November 9, 2018 meeting when the female staff held a group meeting with Respondent, Daniel Pipes to report Respondent, Greg Roman's discrimination and harassment in the workplace, included: Patricia McNulty, Lisa Barbounis, DeLaney Yonchek, Respondent, Matt Bennett, Stacy Roman, Thelma Prosser, Marnie Meyer, Mark Fink, Respondent, Daniel Pipes, and Charging Party, Caitriona Brady. Stacy Roman is Respondent, Greg Roman's sister. Her presence at a meeting held to report and begin investigations into Respondent, Greg Roman's discrimination and harassment in the workplace is indicative of Respondents' utter and total disregard for the anti-discriminatory intent promulgated by Title VII. Throughout the entire meeting, while the female staff who were subjected to severe and pervasive discrimination and harassment in the workplace attempted to report Respondent, Greg Roman's unlawful conduct, Respondent, Greg Roman's sister, Stacy Roman was belligerent and interjected argumentative comments. For example, Stacy Roman blamed the women who were subjected to discrimination and harassment based upon their sex and gender stating that they should not have worn such short skirts. Notwithstanding, Respondent, Daniel Pipes and house counsel, Mark Fink refused to ask Stacy Roman to leave in order to provide the female staff who were subjected to discrimination and harassment with a safe environment in which to make their reports. Moreover, Daniel Pipes actually invited Respondent, Greg Roman to the meeting, although he did not attend. Respondent, Daniel Pipes coerced the female staff to sign nondisclosure agreements ("NDA") in order to attend. Respondent, Daniel Pipes would not allow the female staff including Charging Party, Caitriona Brady to report discrimination and harassment in the workplace until she signed an NDA. Respondent, Greg Roman set up cameras around the office and harassed the female staff by monitoring everything they did, including Charging Party, Caitriona Brady. These cameras are still operational today and Respondent, Greg Roman continues to harass the female staff using surveillance equipment. Respondent, Greg Roman used the surveillance equipment to monitor female staff and how often and how long they used the bathroom. On one occasion, Charging Party, Caitriona Brady worked on a spreadsheet. Respondent, Greg Roman was not in the office. While working, Charging Party, Caitriona Brady received an electronic message from Respondent, Greg Roman that stated, "didn't you already input that one?" Respondent, Greg Roman's message was designed to harass, scare, intimidate, and alarm Charging Party, Caitriona Brady by telling Charging Party, Caitriona Brady he was watching her. Respondent, Greg Roman told female employees how many times they used the restroom in a given day. For example, he would say, Caitriona used the bathroom five (5) times today. Respondent, Greg Roman actively attempted to have sexual relations with interns. Due to this information and Respondent, Greg Roman's history of discrimination and harassment, female staff including Charging Party are afraid to be alone with Respondent Greg Roman. Charging Party sent text messages to Respondent Matt Bennett notifying Respondent, Matt Bennett that she was afraid to be along with Respondent, Greg Roman. Respondent, Matt Bennett refused to conduct an investigation. No corrective action was taken. Respondent, Greg Roman forced female employees to sit next to him at his desk, instead of across from him. Respondent, Greg Roman got inappropriately close to the female staff including Charging Party, Caitriona Brady. Respondent, Greg Roman forced female staff to sit with him and watch inappropriate videos. Respondent, Greg Roman continued to divulge inappropriate sexual information to female staff. For example, Respondent, Greg Roman spoke about his girlfriend giving him blowjobs. Respondent, Greg Roman gave \$1,200.00 to an intern named Gabrielle Bloom in a quid pro quo sexual exchange. Respondent, Greg Roman started inappropriate sexual rumors involving staff members including, Charging Party, Caitriona Brady. Respondent, Greg Roman informed people in the office that Charging Party's father was having a sexual affair with another staff member. Respondent, Daniel Pipes also maintained sexual relationships with employees including an employee named Brook Goldstein. At present, Charging Party is subjected to a severe and pervasive atmosphere of discrimination and harassment based upon her sex and gender and in retaliation for Charging Party's reports and opposition to discrimination and harassment. Charging Party continues her attempts to report and obtain assistance from Respondent, Daniel Pipes. Respondent, Daniel Pipes continues to protect, shield, indemnify and assist Respondent, Greg Roman from any and all impact caused by his severe and pervasive discrimination and harassment. Accordingly, Respondent, Daniel Pipes has condoned, sanctioned, permitted, and allowed the discrimination, harassment, and retaliation to continue. Respondents have made Charging Party's working conditions so onerous, abusive, and intolerable that no person in Charging Party's shoes should be expected to continue working under such conditions. As a result of Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed. As a result of Respondents' conduct, Charging Party was caused to sustain serious and permanent personal injuries, including permanent psychological injuries. As a result of Respondents' actions, Charging Party felt extremely humiliated, degraded, victimized, embarrassed and emotionally distressed. As a result of the acts and conduct complained of herein, Charging Party has suffered and will continue to suffer a loss of income, loss of salary, bonuses, benefits and other compensation to which such employment entailed. Charging Party also suffered future pecuniary losses, emotional pain, humiliation, suffering, inconvenience, loss of enjoyment of life, and other non-pecuniary losses. Charging Party has further experienced severe emotional and physical distress. As Respondents' conduct has been malicious, willful, outrageous, and conducted with full knowledge of the law, Charging Party demands Punitive Damages as against all the Respondents, jointly and severally. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation. At all times material Respondents refused to investigate or take appropriate remedial action in response to Charging Party's complaints of discrimination, harassment and hostile work environment. Respondents discriminatory conduct was severe and pervasive, and created a hostile work environment for Charging Party. The above are just some examples of some of the discrimination and retaliation to which Respondents subjected Charging Party. Charging Party claims a pattern and practice of discrimination, claims continuing violations, and makes all claims herein under the continuing violations doctrine. Respondents have exhibited a pattern and practice of not only discrimination but also retaliation.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

X

6/13/19

Date

Caitriona M Brady

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

Sh Sahli

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

x Caitriona M Brady

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

6/13/19

Commonwealth of Pennsylvania - Notary Seal
 THOMAS SULLIVAN, Notary Public
 Philadelphia County
 My Commission Expires March 11, 2023
 Commission Number 1347443

**INFORMATION FOR COMPLAINANTS & ELECTION OPTION TO DUAL FILE WITH THE
PENNSYLVANIA HUMAN RELATIONS COMMISSION**

Case Name: Caitriona Brady v. Middle East Forum

EEOC Charge Number: _____

You have the right to dual file this EEOC charge of discrimination with the Pennsylvania Human Relations Commission (PHRC) under the Pennsylvania Human Relations Act. Filing your charge with PHRC protects your state rights, especially since there may be circumstances in which state and federal laws and procedures vary in a manner which could affect the outcome of your case.

Complaints filed with PHRC must be filed within 180 days of the act(s) which you believe are unlawful discrimination. If PHRC determines that your PHRC complaint is untimely, it will be dismissed.

If you also want your EEOC charge filed with PHRC, including this form as part of your EEOC charge, with your signature under the verification below, will constitute filing with PHRC. You have chosen EEOC to investigate your complaint, so PHRC will not conduct a separate investigation and, in most cases, will accept EEOC's findings. If you disagree with PHRC's adoption of EEOC's findings, you will have the chance to file a request for preliminary hearing with PHRC.

Since you have chosen to initially file your charge with EEOC, making it the primary investigatory agency, the Respondent will not be required to file an answer with PHRC, and no other action with PHRC is required by either party, unless/until otherwise notified by PHRC.

If your case is still pending with PHRC after one year from filing with PHRC, you have the right to file your complaint in State court. PHRC will inform you of these rights and obligations at that time.

SIGN AND DATE APPROPRIATE REQUEST BELOW

I want my charge dual filed with PHRC. I hereby incorporate this form and the verification below into the attached EEOC complaint form and file it as my PHRC complaint. I request that EEOC transmit a copy to PHRC.

I understand that false statements in this complaint are made subject to the penalties of 18 Pa. C.S. 4904, relating to unsworn falsification to authorities.

X Caitriona M Brady
Signature and Date

OR

I do not want my charge dual filed with PHRC.

Signature and Date

DATED: June 20, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Responses to Defendants' Requests for Admissions to be served via email to:

David J. Walton (PA # 86019)
Leigh Ann Benson (PA #319406)
Cozen O'Connor
1650 Market Street, Suite 2800
Philadelphia, PA 19103
P: 215-665-2000
F: 215-665-2013
dwalton@cozen.com
lbenson@cozen.com

DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
SETH D. CARSON

DATED: July 12, 2020

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

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Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA
☒ EEOC

 Pennsylvania Human Relations Commission and Philadelphia Commission on Human Relations and EEOC
 State or local Agency, if any

Name (indicate Mr., Ms., Mrs.)

Caitriona Brady

Home Phone (Incl. Area Code)

856-454-3729

Date of Birth

05-08-1996

Street Address

City, State and ZIP Code

749 Salter Street, Philadelphia, PA 19147

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

Middle East Forum

No. Employees, Members

25

Phone No. (Include Area Code)

215-546-5406

Street Address

City, State and ZIP Code

1650 Market Street, Suite 3600, Philadelphia, PA 19103

Name

Greg Roman, Daniel Pipes, Matt Bennett

No. Employees, Members

25

Phone No. (Include Area Code)

215-546-5406

Street Address

City, State and ZIP Code

1650 Market Street, Suite 2600, Philadelphia, PA 19103

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN
☒ RETALIATION ☐ AGE ☐ DISABILITY ☐ GENETIC INFORMATION
☒ OTHER (Specify)
DATE(S) DISCRIMINATION TOOK PLACE
Earliest Latest

October 2017-October 2019

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Charging Party, Caitriona Brady was subjected to a severe and pervasive atmosphere of discrimination and harassment in the workplace. Charging Party now files this Second Charge of Discrimination against the above named Respondents, Middle East Forum, Greg Roman, Daniel Pipes, and Matthew Bennett. Charging Party was employed at the Middle East Forum from October 2017 until her unlawful termination by constructive discharge sometime around October 2019. Charging Party Caitriona Brady notified Respondents that she could no longer tolerate working in such hostile work conditions and resigned her position at the Middle East Forum to avoid further discrimination and harassment and retaliation to which Charging Party was subjected by Respondents during her employment. Charging Party's prepared a resignation letter and notified Respondents that she could no longer tolerate the severe and pervasive discrimination and harassment which caused Charging Party to suffer physical and mental distress. Charging Party reported the discrimination and harassment and was subjected to further retaliation.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

12/16/19

Date

CMBrady

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

Sarah Herster

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

CMBrady

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

12/16/19

 Commonwealth of Pennsylvania - Notary Seal
 SARAH HERSTER - Notary Public
 Philadelphia County
 My Commission Expires Aug 30, 2023
 Commission Number 1357100

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

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Charge Presented To: Agency(ies) Charge No(s):

☐ FEPA☐ EEOC

and EEOC

State or local Agency, if any

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Charging Party filed a Charge at the EEOC and was further subjected to retaliation. Charging Party hereby would ask the EEOC and Pennsylvania Human Relations Commission and Philadelphia Commission on Human Relations to consider her previously filed Charge of Discrimination which was assigned the Charge number 530-2019-05028. When this Charge was filed in June 2019, Charging Party had not yet been constructively discharged from her employment. After filing her Charge, Charging Party was subjected to further discrimination, harassment and retaliation. Charging Party attempted to continue her employment at the Middle East Forum however, Respondents initiated a campaign of retaliation against Charging Party pursuant to Charging Party's reports of discrimination and harassment and her attempts to vindicate her rights by filing a Charge of Discrimination, previous Charge number identified above. Charging Party was subjected to tangible employment actions. Charging Party's position with the Middle East Forum was changed and altered. Charging Party's ability to do the work that she was responsible for changed at Respondents subjected Charging Party to further discrimination and harassment and retaliation by reassigning Charging Party or subjecting Charging Party to discipline. Charging Party was threatened. Charging Party was ignored. The entire office changed after Charging Party filed her Charge and it was communicated to Charging Party without any ambiguity that Charging Party was no longer welcome at the Middle East Forum. Charging Party was made to understand that she was not welcome at the Middle East Forum and that Charging Party's future at the Middle East Forum would afford Charging Party no opportunity for advancement and indeed Charging Party would not even be permitted to perform the same responsibilities that she performed prior to Charging Party submitting a Charge of Discrimination at the EEOC and PHRC. Respondents disparate treatment and retaliation against Charging Party and the hostile work environment that began June 2018 culminated in a tangible employment action: Charging Party's termination. Charging Party was reprimanded and issued verbal warnings for no reason other than retaliation. Respondents refused to work with Charging Party or even communicate with her. Respondent, Daniel Pipes discontinued all communicate with Charging Party in person and entered the office, ignored Charging Party and shut his door. This behavior marked significant change from the way that Charging Party was treated prior to her attempts to vindicate her rights. All support for Charging Party was withdrawn. Respondents refused to communicate with Charging Party and all communication to Charging Party indicated that Charging Party was no longer welcome as an employee at the Middle East Forum. Respondents refused to terminate Charging Party's employment for liability purposes but refused to work with her as a employee. Charging Party had no choice but to discontinue her own employment as Charging Party would no longer receive any support, communication, or recognition from Respondents. Respondent conduct and comments was of a gender based nature and retaliatory nature and had the purpose and effect of unreasonably interfering with Charging Party's work environment.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

12/16/19

Date

CMBrady

Charging Party Signature

NOTARY - When necessary for State and Local Agency Requirements

Sarah Herster

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

CMBrady

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

12/16/19

Commonwealth of Pennsylvania - Notary Seal
SARAH HERSTER - Notary Public
Philadelphia County
My Commission Expires Aug 30, 2023
Commission Number 1357100

